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13 *Toshiba America, Inc.,*

14 *Toshiba America Consumer Products, LLC,*

15 *Toshiba America Information Systems, Inc., and*

16 *Toshiba America Electronic Components, Inc.*

17 UNITED STATES DISTRICT COURT  
18 NORTHERN DISTRICT OF CALIFORNIA  
19 (SAN FRANCISCO DIVISION)

20 IN RE: CATHODE RAY TUBE (CRT)  
21 ANTITRUST LITIGATION

Case No. 07-5944 SC  
MDL No. 1917

22 This Document Relates To:

23 *P.C. Richard & Son Long Island Corp., et al.*  
24 *v. Hitachi, Ltd., et al.*, No. 12-cv-02648;

25 *P.C. Richard & Son Long Island Corp., et al.*  
26 *v. Technicolor SA, et al.*, No. 13-cv-05725.

**DECLARATION OF  
LUCIUS B. LAU IN SUPPORT OF  
THE TOSHIBA DEFENDANTS'  
ADMINISTRATIVE MOTION TO  
FILE DOCUMENTS UNDER SEAL  
PURSUANT TO CIVIL LOCAL  
RULES 7-11 AND 79-5(d)**

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DECLARATION OF LUCIUS B. LAU IN SUPPORT OF THE TOSHIBA  
DEFENDANTS' ADMINISTRATIVE MOTION TO FILE DOCUMENTS  
UNDER SEAL PURSUANT TO CIVIL LOCAL RULES 7-11 AND 79-5(d)

Case No. 07-5944-SC  
MDL No. 1917

1 I, Lucius B. Lau, hereby declare as follows:

2 1. I am an attorney with the law firm of White & Case LLP, counsel for  
3 Defendants Toshiba Corporation, Toshiba America, Inc., Toshiba America Consumer  
4 Products, LLC, Toshiba America Information Systems, Inc., and Toshiba America Electronic  
5 Components, Inc. (collectively, the “Toshiba Defendants”).

6 2. I submit this declaration in support of the Toshiba Defendants’ Administrative  
7 Motion to File Documents Under Seal Pursuant to Civil Local Rules 7-11 and 79-5(d), dated  
8 November 7, 2014, filed contemporaneously herewith. I have personal knowledge of the  
9 facts stated herein, and I could and would competently testify thereto if called as a witness.

10 3. On June 18, 2008, the Court issued a Stipulated Protective Order (Dkt. No.  
11 306) (the “Stipulated Protective Order”).

12 4. Plaintiff MARTA Cooperative of America, Inc. (“MARTA”) has produced  
13 certain documents that it designated as “Highly Confidential” or “Confidential” under the  
14 Stipulated Protective Order.

15 5. MARTA has designated the transcripts of the depositions of Robert  
16 Thompson and Aimee Fields as “Confidential” under the Stipulated Protective Order.

17 6. On November 7, 2014, the Toshiba Defendants filed the Defendants’ Notice  
18 of Motion and Motion for Summary Judgment With Respect to MARTA (“Defendants’  
19 Motion”) and the Declaration of Lucius B. Lau in Support of the Defendants’ Motion, and  
20 attached, as Exhibits A, C, D, F, G, I, and J, certain documents which MARTA designated as  
21 “Highly Confidential” or “Confidential”; and, as Exhibits B and E, transcript excerpts of the  
22 deposition testimony of Robert Thompson and Aimee Fields. As such, the Toshiba  
23 Defendants filed these materials under seal.

24 7. Portions of the Defendants’ Motion contain quotations from, and discussions  
25 of, the above-specified “Highly Confidential” or “Confidential” material. As such, the  
26 Toshiba Defendants filed the Defendants’ Motion under seal.

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DECLARATION OF LUCIUS B. LAU IN SUPPORT OF THE TOSHIBA  
DEFENDANTS’ ADMINISTRATIVE MOTION TO FILE DOCUMENTS  
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1 I declare under penalty of perjury under the laws of the United States of America that  
2 the foregoing is true and correct.

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4 Executed this 7<sup>th</sup> day of November, 2014, in Washington, D.C.

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Lucius B. Lau

DECLARATION OF LUCIUS B. LAU IN SUPPORT OF THE TOSHIBA  
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